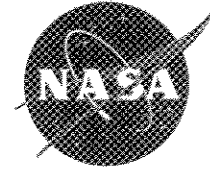


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



September 8, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space Transportation Association (STA) Luncheon on September 9, 2010

On September 9, 2010, the Space Transportation Association (STA), will host a luncheon at the Rayburn House Office Building, Room 2325, in Washington, D. C. from 10:00 a.m.- 12 :00 p. m. The co-sponsors of the STA include Aerojet, ATK, Ball, Boeing, ITT, Lockheed Martin, QineiQ, Paragon, Pratt & Whitney Rocketdyne, ULA, United Space Alliance, and Wyle.

The luncheon will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 300 people have been invited and 30 are expected to attend. The estimated cost of the luncheon which includes all food and beverages, is \$10.00 per person. I find that the STA event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the luncheon will allow NASA representatives to discuss areas of interest to NASA, and to discuss NASA's programs and plans. Accordingly, NASA employees whose duties do not substantially affect STA or co-sponsors may accept an invitation for free attendance to the luncheon for themselves and their spouses or guests.

However, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the luncheon for themselves and any accompanying guest. Moreover, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".  
Adam F. Greenstone